



September 29, 2025

To: Wil Lyons, Planner, Permit Sonoma
CCs: Scott Orr, Acting Director, Permit Sonoma
Supervisor Rebecca Hermosillo

RE: Scoping comments re the Notice of Preparation (NOP) for the Sonoma Developmental Center (SDC)

I write this single-topic letter of comment not because the subject is the only one about which we are concerned about in the NOP as presented. Rather it is because the topic is central to the proposal being evaluated in the NOP and its EIR, and because it has, knowingly or inadvertently, been totally left out of both the "Project Descriptions" in the NOP (and apparently in the consultants' scope of work) for both of the parallel evaluations about to start under CEQA.

Demolition, excavation and disposal.

The subject here is the almost total omission of any true mention of the massive demolition, ground disturbance through excavation, and off-site disposal issues that would be associated with the project in the project descriptions associated with both the Specific Plan and the Project Plan as presented in the NOP – and therefore the potential omission of those issues from the EIR to come.

Without discussion of those vital topics, on which the entire existence of the proposed project depends, the NOP would be flawed and inadequate, and clearly subject to challenge.

The project description must be edited and reissued before the CEQA process can proceed. To fail to do that would be to potentially mislead the public and the decision makers with responsibility for the project - including the Planning Commission and the Board of Supervisors - as occurred, for the same reason, in the first attempt at adopting a Specific Plan. It would also, we believe, be counter to the Judge's orders in his decision in the SCALE lawsuit.

Deficiencies in the project description.

Specific Plan.

In the NOP as issued, the project description for the Specific Plan for the SDC property is brief (less than a page, on page 6) while the description of the Eldridge Renewal Project is more extensive (6 pages plus).

However, while the project description for the Specific Plan is aspirational in the language it uses to describe the anticipated mix of the development proposed on the property, it is virtually silent on:

- a) the demolition required, or on the need to excavate to a depth of 12.5 feet across 132 acres of the site in order to accommodate those aspirations, or
- b) the implied intention of the Specific Plan to authorize the demolition of more than 95% of the historic buildings on the site (61 out of 65) to build an entirely new development on the site now occupied by those buildings and their landscape.

Those are serious omissions for a project description that is required to be accurate under CEQA and State law.

Eldridge Renewal Project.

The project description for the developers' plan is not much better. It again speaks eloquently to a mix of "990 residential units, 130,000 sq. ft. of commercial and institutional uses, and a 150-room hotel and 120,000 sq. ft. parking structure", all of which would appear to the reader of the NOP to emerge whole-cloth from the ground on a site that is ready for them.

However, the description in the NOP, required to be accurate under CEQA, makes no mention of the massive demolition, site clearance, and excavation that would be required to clear enough room to even begin to accommodate all that development.

It is only on page 9 that the project description refers to the "southwestern part of the core campus on the site of Sonoma House, which would be demolished" and says that the project "would redevelop the site infrastructure and utility network that historically served the site". Nowhere does it say that that process would require the entire removal, excavation and demolition of virtually all of the remaining buildings and all of the existing streets in the core campus under which those utilities are located.

Demolition is also only mentioned in the "phasing and buildout" section on page 12 of the NOP, but then only in the context of a brief description of a three-phase development process that would extend through 2036. Even that description is inconsistent with regard to demolition, however, with statements implying that demolition would be "phased" while statements made by the developer at the NOP hearing imply that "all of the demolition and site preparation will happen at the beginning", presumably anticipating one massive action of destruction and excavation. Whether this would be a one phase process, or a three-phase

process, should be clarified in the project description section of the NOP, particularly since each would come with a different set of impacts over time

The first real clue regarding the demolition required for the project comes under “soil erosion”, where the NOP says “136 acres of the 160-acre core campus would be disturbed and modified to prepare the site for construction of the Eldridge Renewal Project” (underline mine). Otherwise only one-line comments in the “probable environmental impacts of the project” section, and under “air quality” and “hazardous materials”, give any hint of the extent of the demolition and destruction on which the developers’ proposal, and now potentially the Specific Plan if approved, depend.

Historic Resources.

Incongruously, however, the “Historic Resources” section (page 16 of the NOP) makes the statement “given the presence of historic resources throughout the Project area, the potential for demolition and new development to adversely affect historic resources will require careful consideration and analysis.” That is truly an understatement for a project that proposes, and is entirely dependent on, the total eradication of the vast majority of those historic resources, plus the Historic District and the Cultural Landscape of which they are a part. It is a conflict in policy that must be evaluated in the EIR

Demolition and excavation is a phase by itself.

Scale.

The scale and impact of the demolition and excavation proposed by Eldridge Renewal at SDC is large enough to be treated as an entirely new phase of development, all of which would, if we hear the developer correctly, precede the several phases of development described on Pages 12 and 13, of the NOP document.

Permitting.

Given the circumstances on the site, the permitting process associated with, and preceding the demolition proposed, would likely take more than a year to complete given the range of local, State and even Federal agencies which would have to provide permits. Perhaps longer.

Particular attention would be needed in the permitting process to ensure that the release of hazardous materials into the air, and into nearby streams (including Sonoma Creek, a public trust resource) is minimized when buildings and landscape are disturbed by the wrecker’s ball, by detonation, or by heavy machinery.

Reuse and disposal of waste materials.

Due to the potential for the presence of embedded hazardous materials, the waste concrete produced on the site would also not be acceptable for the on-site grinding and reuse technologies used elsewhere. Waste materials produced from demolition would therefore be treated as “hazardous”, to be carefully loaded, covered, and transported to designated

hazardous-materials disposal sites as far away as Utah and Arizona – assuming even that the needed capacity is available there in the wake of the Los Angeles fires of 2024 and other similar fire events.

Timing, extent and impacts over time.

The demolition phase (assuming it is a single phase) would only take place once the permits are in place, and it would very likely last for many months - quite likely for more than a year. During that time, the site would have to be carefully managed, especially during winter weather when there would be a particular need to protect the water quality and flow in Sonoma Creek and its tributaries. Deep excavation also creates the likelihood that deep holes would be created alongside the creek where buildings now exist, potentially interrupting both the surface and subsurface flows that are vital to the survival Sonoma Creek and its riparian habitat and endangered species.

Under the plan proposed by the developer – and now the County - demolition and major site grading would also take place at the very interface with the wildlife migration corridor as the Paxton, Goddard and the Industrial Shop buildings are removed to make way for the hotel and related facilities, and the massive parking structure, proposed at that location. Several stories for the proposed hotel would be carved out of the face of the hill that now directly faces the corridor, and no mention is made of how the stream at the foot of the hill at that location (itself a part of the wildlife corridor) would be handled and protected.

After demolition would begin a process of backfilling of the deep and extensive holes created by the excavation. All would require a level of fill consolidation that requires heavy equipment to achieve the compaction necessary to safely support the three-story apartment building construction proposed for the site. No mention is made of where the fill material would come from (itself another potential set of impacts), or how the process would be handled over the many months it would require. Similarly, no indication is provided in the developers' proposal regarding the cost of demolition, or of the construction of the treatment plants that would appear to be necessary to support the very large development proposed. It would appear however that an investment of many tens of millions of dollars would be needed, even before any development could take place on the site.

Living with it.

It would also therefore appear that actual construction on the site could be delayed for more than two years by the demolition and site clearing process. During that time the site would be a wasteland. A wasteland that would, according to the developers' statement, endure over three phases spread over a period of nine years during which the residents of Glen Ellen and the Sonoma Valley who use Arnold Drive to get to work, or school, or to the shops would apparently have to "live with it" every day of their lives – or would have to evacuate through it in case of a wildfire, just to save their lives.

And during that time of demolition and site grading, absolutely no progress would be made toward the construction of even the first 50 units of affordable housing described as an "urgent need" in the Enabling Legislation and promised in "Phase 1" of the developers' proposal. Other alternatives would likely offer better and quicker solutions, but that is not the point here.

Extent of impacts.

The potential for dust and grime, noise and air pollution and odors from demolition, excavation, and truck and heavy-equipment usage needs no description here. But consideration does need to be given to whether it is even acceptable, given its impacts on the community at large and its disturbance, almost to the point of extinction, of the animal population in the sensitive wildlife migration corridor that now flanks and surrounds the site. Protection of that resource is the specific purpose of the Enabling Legislation, and it is a necessary point of analysis in the EIR process now beginning

The demolition of 61 very substantial buildings would also be a daunting task. Many are multistory structures with partial- or full-basements (hence the need for deep excavation), and all are built out of concrete and masonry and to institutional standards. All are also widely distributed over 136 acres of the site.

Combine that demolition with the proposed (but not described) removal, through cutting or through excavation, of an estimated 500 to 700 trees on the site, and the tearing out of eleven full blocks of existing streets and their underlying utility services to a depth of 12.5 feet, and you have a significant project component that needs to be described and evaluated in some detail in any EIR at any level of consideration (Specific Plan or Project Review), starting with the project description.

Conclusion.

The issue of demolition is so large, and so important to the very presence and feasibility of the project proposed by the developers, Eldridge Renewal LLC, that it must be given full attention in any evaluation of feasibility, and in the EIR in particular.

The issues are however, not only environmental, but they go far into the questions of:

- a) the financial feasibility of the project as now proposed, including its ability to deliver the affordable housing required in the Enabling Legislation, and
- b) the effects of demolition on the timing of the project, and on its ability to deliver the other benefits required by the Enabling Legislation. By comparison, approaches that do not rely on massive demolition and high densities can start quicker, deliver better, are less expensive, and would result in a far more compatible neighbor for the community in Glen Ellen and the Sonoma Valley than what is now proposed.

We understand that these are not subjects that are typically covered by the EIR process under CEQA, but they do seem to apply here and should not be forgotten in the decisions soon to be made at various levels of government about the fate of the SDC property – and, along with it, the fate of the community in the Sonoma Valley now and for the next hundred years.